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12 Special Insurance Counsel for Debtor and
13 Debtor in Possession
14 PLANT INSULATION COMPANY

15 UNITED STATES BANKRUPTCY COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 In re
18 PLANT INSULATION COMPANY, a
19 California corporation,
20 Debtor.

Case No. 09-31347-TC

Chapter 11

**SNYDER MILLER & ORTON LLP'S
FOURTEENTH COVER SHEET
APPLICATION FOR REIMBURSEMENT
OF EXPENSES FOR THE PERIOD FROM
SEPTEMBER 1, 2010 THROUGH
SEPTEMBER 30, 2010**

[No Hearing Required]

Judge: Hon. Thomas E. Carlson

21 Snyder Miller & Orton LLP ("SMO") submits its Fourteenth Cover Sheet Application (the
22 "Application") for Reimbursement of Expenses for the Period from September 1, 2010 through
23 September 30, 2010 (the "Application Period"). In support of the Application, SMO respectfully
24 represents as follows:

25 1. SMO is Special Insurance Counsel for debtor and debtor in possession Plant Insulation
26 Company (the "Debtor") in the above-referenced Chapter 11 case. SMO hereby applies to the Court
27 for reimbursement of expenses incurred during the Application Period.
28

2. SMO billed a total of \$894.18 in expenses during the Application Period.

3. SMO seeks reimbursement of 100% of these expenses. Because these costs are below the Contingency Professional Expense Cap, as defined by this Court's *Order Establishing Interim Fee Application and Expense Reimbursement Procedures* entered on September 24, 2009 (the "Interim Fee Procedures Order"), the Debtor is authorized to reimburse SMO for these expenses without prior Court approval.

4. The following chart reflects (1) the post-petition compensation and expense reimbursement amounts SMO has obtained authority to receive from the Debtor's estate pursuant to Interim Fee Procedures Order, and (2) excluding the amounts sought by this Application, the post-petition compensation and expense reimbursement amounts that are currently due and owing to SMO from the Debtor's estate:

Fee Statement Period	Fees Sought (100%)	Expenses Sought (100%)	Fees Authorized (80%)	Expenses Authorized (100%)	Unpaid Fees	Unpaid Expenses
5/20/09 – 8/31/09	NONE	26,288.33	NONE	\$26,288.38	NONE	NONE
9/1/09 – 9/30/09	NONE	\$1,680.79	NONE	\$1,680.79	NONE	NONE
10/1/09 – 10/31/09	NONE	\$9,183.62	NONE	\$9,183.62	NONE	NONE
11/1/09 – 11/30/09	NONE	\$11,139.61	NONE	\$11,139.61	NONE	NONE
12/1/09 – 12/31/09	NONE	\$5,053.53	NONE	\$5,053.53	NONE	\$5,053.53
1/1/10 – 1/31/10	NONE	\$311.91	NONE	\$311.91	NONE	\$ 311.91
2/1/10 – 2/28/10	NONE	\$266.74	NONE	\$266.74	NONE	\$ 266.74
3/1/10 – 3/31/10	NONE	\$1180.18	NONE	\$1180.18	NONE	\$1180.18
4/1/10 – 4/30/10	NONE	\$777.24	NONE	\$777.24	NONE	\$777.24

Fee Statement Period	Fees Sought (100%)	Expenses Sought (100%)	Fees Authorized (80%)	Expenses Authorized (100%)	Unpaid Fees	Unpaid Expenses
5/1/10 – 5/31/10	NONE	\$87.48	NONE	\$87.48	NONE	\$87.48
6/1/10 – 6/30/10	NONE	\$792.11	NONE	\$792.11	NONE	\$792.11
7/1/10 – 7/31/10	NONE	\$418.48	NONE	\$418.48	NONE	\$418.48
8/1/10 – 8/30/10	NONE	\$827.03	NONE	\$827.03	NONE	\$827.03

5. Attached hereto as **Exhibit A** is the detailed billing statement for the Application Period, which includes a breakdown of the expenses incurred during the Application Period. Although the date of some of the advances listed on the detailed billing statement are prior to the Application Period, SMO paid and billed those advances during the Application Period.

6. SMO has served a copy of this Application on the Office of the United States Trustee, the Debtor, counsel for the Official Committee of Unsecured Creditors (the "Committee"), and counsel for the Futures Representative appointed by the Court in this case.

7. Notice of the filing of this Application has been served on the Office of the United States Trustee, the Debtor, counsel to the Committee, counsel to Futures Representative and any party who has requested special notice as of the date of the Notice.

8. Pursuant to the Interim Fee Procedures Order, the Debtor is authorized to make the payment requested herein without a further hearing or order of this Court unless an objection to this Application is filed with the Court and served within ten (10) calendar days after the date of mailing of the Notice of this Application. If such an objection is filed, the Debtor is authorized to pay the 100% of the uncontested expenses.

9. The reimbursement of expenses sought in this Application is not final. Upon the conclusion of this case, SMO will seek fees and reimbursement of the expenses incurred for the totality of the services rendered in the case. Any interim fees or reimbursement of expenses approved

1 by this Court and received by SMO will be credited against such final fees and expenses as may be
2 allowed by this Court.

3 10. Based upon the foregoing, SMO respectfully requests that the Debtor pay
4 compensation to SMO as requested herein pursuant to and in accordance with the terms of the
5 Interim Fee Procedures Order.

6 DATED: October 25, 2010

SNYDER MILLER & ORTON LLP

7
8
9 By:



Peter P. Meringolo
Special Insurance Counsel for Debtor and
Debtor in Possession, Plant Insulation Company

EXHIBIT A

180 Montgomery Street, Suite 700
San Francisco, California 94104
Telephone: (415) 962-4400
Fax: (415) 962-4401

Federal Tax ID#: 41-2118714

Plant Insulation Company
2271 California Street
San Francisco CA 94115

Attn: David J. Gordon

Page: 1
October 08, 2010
Account No: 67-002
Statement No: 1424

Insurance Litigation
Plant Insulation Company
Special Counsel Fee Agreement

	Previous Balance	\$9,714.70
	<u>Expenses</u>	
09/30/2010	Photocopies - September 2010.	124.20
	Total Expenses	124.20
	<u>Advances</u>	
09/07/2010	Online legal research Thomson West Invoice No. 821261993: August 2010.	764.94
09/30/2010	Online legal research: PACER quarterly charges 07/01/10 - 09/30/10.	5.04
	Total Advances	769.98
	Total Current Work	894.18
	Balance Due	<u>\$10,608.88</u>
	Total Amount Due:	<u>\$10,608.88</u>

180 Montgomery Street, Suite 700
San Francisco, California 94104
Telephone: (415) 962-4400
Fax: (415) 962-4401

Federal Tax ID#: 41-2118714

Plant Insulation Company
2271 California Street
San Francisco CA 94115

Attn: David J. Gordon

Page: 1
October 08, 2010
Account No: 67

Previous Balance	Fees	Expenses	Advances	Payments	Balance
67-002 Insurance Litigation					
	Plant Insulation Company				
	Special Counsel Fee Agreement				
9,714.70	0.00	124.20	769.98	0.00	<u>\$10,608.88</u>

CERTIFICATE OF SERVICE

I, Michelle Traina, declare that I am over the age of eighteen years and am not a party to this action. My business address is 180 Montgomery Street, Suite 700, San Francisco, California 94104.

On **October 25, 2010**, I served the following:

**SNYDER MILLER & ORTON LLP'S FOURTEENTH COVER SHEET APPLICATION
FOR REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM SEPTEMBER 1,
2010 THROUGH SEPTEMBER 30, 2010**

on the interested parties in this action as follows:

[X] BY U.S. MAIL: I caused the above-referenced documents to be served on the parties below which are designated with an asterisk (*) by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid.

[X] BY EMAIL: I caused the above-mentioned documents to be served by email on the parties listed on the enclosed service list on the date specified above, except those designated with an asterisk (*).

*Debtor Plant Insulation Company c/o TRAVIS & PON 2271 California Street San Francisco, CA 94115 Email: david.j.gordon@verizon.net	*United States Trustee c/o Office of the United States Trustee Donna S. Tamanaha Minnie Loo 235 Pine St., Suite 700 San Francisco, CA 94104-3401 Email: Minnie.Loo@usdoj.gov , Donna.S.Tamanaha@usdoj.gov	*Counsel for Debtor c/o JONES DAY Peter J. Benvenuti, Esq. Tobias S. Keller, Esq. Michaeline H. Correa, Esq. 555 California Street, 26th Floor San Francisco, CA 94104 Email: tkeller@jonesday.com , pjbenvenuti@jonesday.com , mcorrea@jonesday.com
Peter J. Benvenuti Tobias S. Keller Michaeline H. Correa JONES DAY 555 California Street, 26th Floor San Francisco, CA 94104 Telephone: (415) 626-3939 Facsimile: (415) 875-5700 Email: jbenvenuti@jonesday.com tkeller@jonesday.com mcorrea@jonesday.com	Debtor's Special Insurance Counsel c/o MORGAN LEWIS & BOCKIUS Jeffery S. Raskin, Esq. One Market, Spear Street Tower San Francisco, CA 94105-1596 Email: jraskin@morganlewis.com	*Counsel to the Hon. Judge Charles B. Renfrew (Ret.), Futures Representative c/o FERGUS, A LAW OFFICE Gary Fergus, Esq. 595 Market St., Suite 2430 San Francisco, CA 94105 Email: gfergus@ferguslegal.com

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<p>Responsible Individual Mr. David J. Gordon c/o THE FLINTKOTE COMPANY Two Embarcadero Center, Ste. 410 San Francisco, CA 94111 Email: david.j.gordon@verizon.net</p>	<p>Accountants for Debtor Mr. Jay D. Crom c/o BACHECKI, CROM & CO. LLP 180 Montgomery St., Suite 2340 San Francisco, CA 94104 Email: jcrom@bachcrom.com</p>	<p>Proposed Counsel for Creditors' Committee Peter Van N. Lockwood, Esq. c/o CAPLAN & DRYSDALE CHARTERED One Thomas Circle, N.W. Washington, DC 20005 Email: pvnl@capdale.com</p>
<p>ACE Fire Underwriters Insurance Company and ACE Property & Casualty Insurance Company c/o O'MELVENY & MYERS LLP Aaron M. Johnson, Esq. Spencer K. Jones, Esq. Christina Brown, Esq. Patrick T. Hein, Esq. 2 Embarcadero Center, 28th Floor San Francisco, CA 94111 Email: aaronjohnson@omm.com spencerjones@omm.com cjbrown@omm.com phein@omm.com</p>	<p>ACE Fire Underwriters Insurance Company and ACE Property & Casualty Insurance Company c/o O'MELVENY & MYERS LLP Richard Goetz, Esq. Steven H. Bergman, Esq. 400 South Hope Street Los Angeles, CA 90071-7899 Email: rgoetz@omm.com sbergman@omm.com</p>	<p>ACE Fire Underwriters Insurance Company and ACE Property & Casualty Insurance Company c/o O'MELVENY & MYERS LLP Tancred V. Schiavoni, Esq. Seven Times Square New York, New York 10036 Email: tschiavoni@omm.com</p>
<p>American Automobile Insurance Company and Fireman's Fund Insurance Company c/o CROWELL & MORING LLP Steven P. Rice, Esq. Thy B. Bui, Esq. Queena Mewers, Esq. 3 Park Plaza, 20th Floor Irvine, CA 92614 Email: srice@crowell.com tbui@crowell.com qmewers@crowell.com</p>	<p>American Automobile Insurance Company and Fireman's Fund Insurance Company c/o GRIPPO & ELDEN LLC Donald A. Vogelsang, Esq. Paul A. Sheldon, Esq. Matthew O. Sitzer, Esq. Lynn H. Murray, Esq. Michael S. Gulland, Esq. 111 South Wacker Chicago, IL 60606 Email: dvogelsang@gripoelden.com psheldon@gripoelden.com msitzer@gripoelden.com lmurray@gripoelden.com mgulland@gripoelden.com</p>	<p>*American Automobile Insurance Company and Fireman's Fund Insurance Company c/o BRYDON HUGO & PARKER Jeffrey Kaufman, Esq. 135 Main Street, 20th Floor San Francisco, CA 94105 Email: jkaufman@bhplaw.com</p>

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Unsecured Creditors' Committee Members

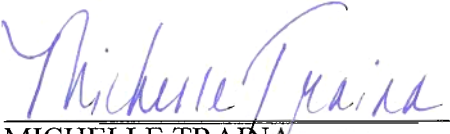
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<p>*Karen Garner Aaron H. Simon, Esq. Ronald J. Shingler, Esq. c/o SIMON & SHINGLER, LLP 3220 Lone Tree Way, Suite 100 Antioch, CA 94509 Email: Aaron@simonshinglerlaw.com Ron@simonshinglerlaw.com</p>	<p>*ACE Fire Underwriters Insurance Company and ACE Property & Casualty Insurance Company c/o BERMAN & AIWASIAN Alan S. Berman, Esq. 725 S. Figueroa Street, Suite 1050 Los Angeles, CA 90017 Email: alan.berman@mcclolaw.com</p>	<p>Linda Seiler c/o KAZAN, MCCLAIN, LYONS, GREENWOOD & HARLEY David McClain, Esq. Matthew L. Thiel, Esq. 171 12th St., Suite 300 Oakland, CA 94607 Email: dmcclain@kazanlaw.com mthiel@kazanlaw.com</p>
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, that this declaration is executed on **October 25, 2010**, at San Francisco, California.


MICHELLE TRAINA